

Konrad L. Trope, Esq. SBN 133214  
**Novo Law Group, P.C.**  
 4631 Teller Avenue, Suite 140  
 Newport Beach, California 92660  
 (949) 222-0899 (tel)  
 (949) 222-0983 (fax)

Attorneys for Plaintiff Pacific Information Resources, Inc.

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

Pacific Information Resources, Inc., a  
 California Corporation,

Plaintiff,

vs.

SIMPLE COMMUNICATIONS, an Alabama  
 corporation; WILLIAM TRAVIS SULLIVAN,  
 individually, AND DOES 1 through 100,  
 inclusive, WHOSE IDENTITIES ARE  
 UNKNOWN,

Defendants.

**CASE NO. CV-07-4131 MMC**

**[Before the Honorable Maxine M.  
 Chesney, Courtroom 7]**

**AFFIDAVIT OF KONRAD L. TROPE RE  
 REQUEST FOR ENTRY OF DEFAULT  
 RE WILLIAM TRAVIS SULLIVAN AND  
 SIMPLE COMMUNICATIONS**

Complaint Filed: August 9, 2007  
 Discovery Cut-Off: N/A  
 Trial: N/A  
 Status Conference: N/A  
 Rule 17 Conference: November 16, 2007

I, Konrad L. Trope, state and declare as follows:

1. I am an individual over the age of 18 and I am an attorney licensed to practice before all courts of the State of California. I am an attorney admitted to practice before the United States District Court for the Central District of California. I am the managing shareholder of Novo Law Group, PC, and I am the counsel with the main responsibility for the instant action. We represent Plaintiff Pacific Information Resources, Inc. in the instant action. In that capacity, I could and would competently testify thereto upon information and belief regarding the facts contained herein.

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**AFFIDAVIT OF KONRAD L. TROPE RE REQUEST FOR ENTRY OF DEFAULT RE  
 WILLIAM TRAVIS SULLIVAN AND SIMPLE COMMUNICATIONS**

**Case No. CV-07-4131**

1           2.       Plaintiff Pacific Information Resources, Inc., filed this instant action on August 9,  
2 2007 and the Summons was issued by this Honorable Court, on August 9, 2007, against  
3 Defendants William Travis Sullivan and Simple Communications.

4           3.       On August 21, 2007, Plaintiff caused the Summons and Complaint, and additional  
5 documents, to be served on the said Defendants, as evidenced in the Proofs of Service on file  
6 with this Court.

7           4.       Said Defendants have failed to appear or otherwise respond to the Complaint  
8 within the time prescribed by the Federal Rules of Civil Procedure. Defendants should have  
9 appeared or otherwise responded to the Complaint on or before September 10, 2007.

10          5.       Based upon my information and belief, neither Defendant William Travis Sullivan  
11 nor Simple Communications are invalid or currently serving in the United States military.

12          I declare under penalty of perjury under the laws of the United States of America that the  
13 foregoing is true and correct.

14          Executed this 27<sup>th</sup> day of September, 2007 at Newport Beach, California.

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16                               /s/Konrad L. Trope  
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**PROOF OF SERVICE**

I am employed in the County of Orange, State of California in the office of a member of the Bar of this Court at whose direction this service was made. I am over the age of 18 and not a party to the within action; my business address is: **4631 Teller Avenue, Suite 140, Newport Beach, California 92660.**

On **September 27, 2007**, I served the foregoing document described as:

**AFFIDAVIT OF KONRAD L. TROPE RE REQUEST FOR ENTRY OF  
DEFAULT RE WILLIAM TRAVIS SULLIVAN AND SIMPLE  
COMMUNICATIONS**

on the interested parties in this action by placing ☐ the original ☒ a true copy thereof enclosed in a sealed envelope addressed as follows:

***SEE ATTACHED SERVICE LIST***

**XX BY MAIL:** I deposited such envelope in the mail at Irvine, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the United States Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

**BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the addressee at the address on the attached Mailing List.

**BY FEDEX:** I deposited such envelopes at Irvine, California for collection and delivery by Federal Express with delivery fees paid or provided for in accordance with ordinary business practices. I am "readily familiar" with the firm's practice of collection and processing packages for overnight delivery by Federal Express. They are deposited with a facility regularly maintained by Federal Express for receipt on the same day in the ordinary course of business.

**BY FACSIMILE:** I transmitted the foregoing document by facsimile to the party(s) identified above by using the facsimile number(s) indicated. Said transmission(s) were verified as complete and without error.

**BY INTERNET/E-MAIL:** I transmitted the foregoing document by e-mail to the party(s) identified above by using the Internet Protocol Addresses indicated. Said transmission(s) were verified as complete and without error.

**BY INTERNET/E-MAIL WITH CLERK OF THE COURT:** I certify that on 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing as indicated on the attached Mailing List.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **September 27, 2007**, at Irvine, California.

/s/  
J. Renée Nordyke

***SERVICE LIST:***

*Pacific Information Resources v Simple Communications, et. al.*  
Case No. C-07-4131 MMC

**VIA U.S. MAIL**

William Travis Sullivan  
4931 Mason Road  
Clayton, Washington 99110

Sullivan Communications  
4931 Mason Road  
Clayton, Washington 99110